

REMARKS

Reconsideration and allowance of the above-reference application are respectfully requested. Claims 24-30 are canceled, new claims 45-47 are added, and claims 1-23 and 31-47 are pending in the application.

Claims 1, 11, 21, and 31 were rejected under 35 USC §103 in view of U.S. Patent Publication No. 2003/0016684 by Prasad et al and U.S. Patent No. 5,912,628 to Jeong. This rejection is respectfully traversed.

Each of the independent claims 1, 11, 21, and 31 specify that the signaling network node *classifies* the received signaling message *as assigned to a specific message class* based on *prescribed message class criteria*: as described for example on page 6, lines 25-9, page 7, line 4 to page 8, line 25 (with respect to Fig. 2) and page 9, line 28 to page 10, line 8 with respect to Fig. 4, the processor executes the classification according to the *prescribed message class criteria* to *assign* the received signaling message *to a specific message class*.

In particular, the “prescribed message class criteria” are illustrated in Figs. 1 and 2 as “classification methods” executed by the processor 26 and that are *distinct and independent* from the routing information stored in the routing table 20 (see, e.g., page 7, line 4 to page 8, line 19, page 9, line 28 to page 10, line 1, and page 10, lines 7-8).

Hence, the claimed “classifying” does not rely on the routing information in the routing table, but rather executes the “classifying” based on *prescribed message class criteria* (illustrated, for example, in Fig. 2 and step 40 of Fig. 4).

In addition to “classifying the received signaling message as assigned to a specific message class”, the claims further specify that one of the message class entries stored in the routing table is selected based on the corresponding *identified message class* (identified by the *message class entry*) matching the *specific message class assigned* to the received signaling message. In other words, “classifying” the received signaling message results in the received signaling message being *assigned* to “a specific message class”, such that the one message class entry can be selected based on identifying the one message class entry having a corresponding *identified message class* that matches the *specific message class assigned* to the received

signaling message (see, e.g., page 8, lines 22-25, page 10, lines 7-13 of the specification).

Therefore, the broadest reasonable interpretation of the claimed “classifying” requires not only that a given attribute of the received signaling message be “determined”, but that the received signaling message be *assigned* to a *specific message class* in order to *identify a message class entry stored in the routing table* and having a matching identified message class.

These and other features are neither disclosed nor suggested in the applied prior art.

Prasad et al.

Prasad et al. describes that a processor in a signal transfer point (STP) “*first* reviews the SS7 routing table (RT) 210 *to determine the routing context* associated with the routing code specified by the received SS7 signal as the destination address” (para. 30, lines 13-15). If the routing context is “upward”, the specified routing code can be identified within a separate IP routing table 220; if the routing context is “downward”, the specified routing code needs to be communicated over an existing SS7 network by referencing the appropriate SS7 point code (see, e.g., para. 30, lines 19-23 and para. 32-33).

Hence, Prasad et al. requires that the SS7 routing table 210 of Fig. 4 (800 of Fig. 5) *first* be accessed to determine the routing context (upward or downward). The SS7 routing table 800 of Fig. 5, however, discloses no more than “a particular point code value 800 [] referenced with a routing context” (see para. 33). Hence, Prasad et al. does not disclose the claimed routing table, where each message class entry *not only* identifies a corresponding message class, *but also specifies at least one destination link identifier for a corresponding destination link assigned to the corresponding message class*. In fact, steps 340 and 345 of Fig. 8 simply specify transmitting the signal over an SS7 network, with no reference to any specified destination link identifier for a corresponding destination link *assigned to the corresponding message class* (see para. 41).

Hence, Prasad et al. does not disclose the claimed routing table configured for storing message class entries *identifying* “respective message classes” where “each message class entry [specifies] at least one *destination link identifier* for a corresponding destination link assigned to

the corresponding message class”, as claimed.

For this reason alone the §103 rejection must be withdrawn because it fails to demonstrate that the hypothetical combination of Prasad et al. and Jeong teach all claim limitations. As specified in MPEP §2143.03, entitled “**All Claim Limitations Must Be Taught or Suggested**”: “To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). ‘All words in a claim must be considered in judging the patentability of that claim against the prior art.’ *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).” MPEP §2143.03 at 2100-131 (Rev. 5, Aug. 2006).

Jeong

As admitted in the rejection, “Prasad fails to explicitly suggest selecting one of the destination links based on the processor classifying the received signaling message as assigned to the corresponding message class based on prescribed message class selection criteria.”

Although Jeong teaches selecting a link based on a signaling link selection (SLS) value, Jeong does not disclose or suggest the claimed “classifying the received signaling message *as assigned to the corresponding message class*, based on prescribed *message class selection criteria*.” Rather, Jeong relies on the explicit value of the Signaling Link Selection (SLS) field to explicitly specify the link that should be used: this very teaching is already described in the Applicant’s admitted prior art at page 2, line 27 to page 3, line 3. The use of an explicit Signaling Link Selection is therefore a mapping, and not a classification based on *prescribed message class selection criteria*.

The specification clearly describes that classification cannot be as trivial as mapping the SLS field, as asserted by the Examiner. Hence, the interpretation of the claimed classification “based on prescribed message class selection criteria” as reading solely on the SLS field is inconsistent with the specification, and therefore unreasonable. The Examiner is reminded that the broadest *reasonable* interpretation must be (1) consistent with the specification, and (2)

consistent with the interpretation that those skilled in the art would reach.¹ There is no disclosure or suggestion that reliance *solely on the SLS field* would be interpreted as “classifying the received signaling message ... based on prescribed message class selection criteria.”

Further, Jeong assumes that a specific destination has already been determined (i.e., Exchange B), and that only the specific signal link that connects the two exchanges needs to be identified. For example, Jeong explicitly identifies the exchange as an exchange for “a specific destination” (see col. 3, lines 50-54 and 58-61; column 4, lines 30-35; claims 14 and 15 in column 6). Hence, Jeong provides no disclosure or suggestion of classifying the received signaling message to a specific message class in order to select one message class entry having a corresponding identified message class that *matches* the specific message class, as claimed.

Hypothetical Combination of Prasad and Jeong

The rejection provides an argument why one skilled in the art would have combined the teachings of Prasad and Jeong *generally* (i.e., according to their predictable use); however, the rejection fails to provide any analysis of any “apparent reason” that one of ordinary skill in the art would have provided any improvements *beyond* (i.e., more than) the predictable use of Prasad et al. and Jeong. according to their established functions.²

In particular, the rejection states the motivation for such a modification as “an improved method of selecting a link for the transmission of a signal message.” Hence, one having ordinary skill in the art with combined the teachings of Prasad and Jeong according to their predictable

¹“During patent examination, the pending claims must be ‘given their broadest reasonable interpretation consistent with the specification.’” MPEP §2111 at 2100-46 (Rev. 3, Aug. 2005) (*quoting In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000)).

“The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach.” MPEP §2111.01 at 2100-47 (Rev. 3, Aug. 2005) (*citing In re Cortright*, 165 F.3d 1353, 1359, 49 USPQ2d 1464, 1468 (Fed. Cir. 1999)).

² See *KSR Int’l v. Teleflex, Inc.* No. 04-1350, Slip. op. at 13-14, 82 USPQ2d 1385, 1396.

use: Prasad requires ***first accessing*** the routing table in order to determine the routing context -- the routing context is required in order to determine the “specific destination”; Jeong teaches that ***after*** a specific destination is determined, that a specific link may be chosen ***to reach that specific destination*** based on the signaling link selection value specified in the received signaling message.

Hence, the hypothetical combination teaches no more than first accessing a routing table to find a matching routing table entry to locate a specific destination, *followed by* using the signaling link selection value specified in the received signaling message to identify a specific link to that specific destination.

In contrast, each of the independent claims specify “classifying the received signaling message as assigned to a specific message class based on prescribed message class selection criteria”, and “selecting one of the message class entries based on the corresponding identified message class matching the specific message class of the received signaling message”. Hence the classifying of the received signaling message “as assigned to a specific message class”, in combination with selecting the one message class entry having the corresponding identified message class that ***matches*** the “specific message class of the received signaling message” provides “more than the predictable use of prior art elements according to their established functions”. *KSR Int’l v. Teleflex, Inc.*, Slip op. at 13, 82 USPQ 2d 1385, 1396 (U.S. Apr. 30, 2007).

Hence, the hypothetical combination neither discloses nor suggests that classifying the received signaling message as assigned to a specific message class should be used as the basis for selecting one of the message class entries “based on determining the corresponding identified message class matches the specific message class of the received signaling message”, as claimed.

For these and other reasons, the §103 rejection of independent claims 1, 11, 21, and 31 must be withdrawn.

The rejection of dependent claims 8, 18, 28, and 38 further in view of U.S. Patent Publication No. 2004/0081206 by Allison et al. is respectfully traversed, as Allison et al. is not prior art. Specifically, Allison et al. was filed on July 30 1, 2003, after the December 20, 2001

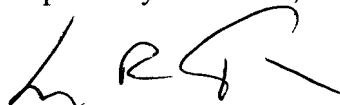
filing date of the subject application. Further, Allison et al. is a CIP of U.S. Patent No. 6,662,017 and U.S. Patent No. 7,035,239 (cited herewith in an Information Disclosure Statement filed on even date herewith). Applicant respectfully submits that the description in paragraph 34 (relied upon in the rejection) is not supported by the parent applications that resulted in U.S. Patent No. 6,662,017 and U.S. Patent No. 7,035,239 (for example, neither parent application disclosed the discriminator 318 of Figure 3). For these and other reasons, this rejection should be withdrawn because Allison et al. is not available as a reference.

It is believed the remaining dependent claims are allowable in view of the foregoing.

In view of the above, it is believed this application is in condition for allowance, and such a Notice is respectfully solicited.

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-474, and please credit any excess fees to such deposit account.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L R T', with a long horizontal stroke extending to the right.

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